USDA

Privacy Impact Assessment

ProTracts/FundManager

Revision: 1.0

United States Department of Agriculture (USDA)

Natural Resources Conservation Service (NRCS)

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Document Information

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Revision History			
Revision	Date	Author	Comments
1.0	7/16/2009	K. Hennings	Initial Fact Gathering – Initial Draft

Distribution List			
Name	Title	Agency/Office	Contact Information

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1 System Information

System Information	
Agency:	USDA - NRCS
System Name:	ProTracts/FundManager
System Type:	☒ Major Application ☐ General Support System ☐ Non-major Application
System Categorization (per FIPS 199):	☐ High ☒ Moderate ☐ Low
Description of System:	The Program Contracts System, known as ProTracts, is a web-enabled application used to manage NRCS conservation program applications, cost share contracts, and program fund management for AMA, CSP, EQIP, and WHIP. ProTracts is used to manage funds allocated from Foundation Financial Information System (FFIS) to state controlled sub accounts, it allows tracking those funds, and managing the applications and contracts associated with those funds. Authorized program payments are generated by electronic fund transfer from FFIS. Internal controls prevent over-obligation of program funds when applications are selected for funding, contracts are signed and obligated, payments are approved and contracts are modified. ProTracts is used to manage conservation contracting activities from application through contract completion. The functions include application tracking, production of filled application and contract forms, and access to automatic generation of applicant letters, practice certification, payment approval and filled payment application forms. There is the ability to generate reports that are used for program management purposes and standard data queries built into many contracting work flows. Contracts are established using state developed cost lists or payment schedules which are maintained in the electronic Field Office Technical Guide (eFOTG). ProTracts is integrated with Farm Service Agency (FSA) web services to enforce payment limitations, adjusted gross income limits (AGI), and participant eligibility determinations.
Who owns this system? (Name, agency, contact information)	Wendall Oaks, Director – USDA – NRCS – ITC wendall.oaks@ftc.usda.gov (970) 295-5479
Who is the Project Manager for this system? (Name, agency, contact information)	Jennifer Schukar, Project Manager – USDA – NRCS – ITC Jennifer.schukar@ftc.usda.gov (970) 295-5476
Who is the security contact for this system? (Name, agency, contact information)	Chuck Hart, Information System Security Manager (ISSM) USDA – NRCS – ITC chuck.hart@ftc.usda.gov (970) 295-5550
Who completed this document? (Name, agency, contact information)	Kimberly Hennings, Systems Security Analyst USDA – NRCS – ITC (Contractor) kim.hennings@ftc.usda.gov (970) 295-5428

2 Data Information

2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	ProTracts/FundManager uses SSNs, TINs, Bank Routing and Bank Account Numbers, Customer Names, Customer Addresses, Customer Property Latitude and Longitudinal coordinates, SCIMS IDs, and Contract IDs.
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	☒ Yes ☐ No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	ProTracts/FundManager issues tax dollars for assistance to program participants.
3	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.	☒ Yes ☐ No
4	Sources of the data in the system.	SCIMS, Customer Service Toolkit (CST), Customers (Public).
4.1	What data is being collected from the customer?	Contact information, farming/ranching data, banking information.
4.2	What USDA agencies are providing data for use in the system?	FSA, NRCS, NFC, RD
4.3	What state and local agencies are providing data for use in the system?	N/A
4.4	From what other third party sources is data being collected?	Participant (Customers, Public)
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	☒ Yes ☐ No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	FSA, NRCS, NFC, RD
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Data sources validate the data similar to how the NRCS does. The data collected from USDA sources is trusted and not verified by NRCS.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	NRCS employees validate data with the participant either verbally or in writing through the use of form CPA-1200. http://www.nrcs.usda.gov/programs/eqip/Forms/NRCS-CPA-1200.pdf

2.2 Data Use

No.	Question	Response
6	Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?	The CPA-1200 form has a privacy statement. http://www.nrcs.usda.gov/programs/eqip/Forms/NRCS-CPA-1200.pdf
7	Will the data be used for any other purpose?	☐ Yes ☒ No – If NO, go to question 8.
7.1	What are the other purposes?	
8	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President	☒ Yes ☐ No
9	Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)?	☐ Yes ☒ No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	☐ Yes ☐ No N/A
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	☐ Yes ☐ No N/A
9.3	How will the new data be verified for relevance and accuracy?	N/A
10	Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?	To arrange contract payment.
11	Will the data be used for any other uses (routine or otherwise)?	☐ Yes ☒ No – If NO, go to question 12.
11.1	What are the other uses?	N/A

No.	Question	Response
12	Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?	☐ Yes ☒ No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	**N/A**
13	Are processes being consolidated?	☐ Yes ☒ No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	**N/A**

2.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	☐ Yes ☒ No – If NO, go to question 15.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	**N/A**
14.2	What are the procedures for purging the data at the end of the retention period?	**N/A**
14.3	Where are these procedures documented?	**N/A**
15	While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	Data is periodically confirmed with the customer either verbally or in writing. Data validation controls are programmed into the system to verify information is complete and accurate before payments are disbursed.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	☒ Yes ☐ No

2.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	☒ Yes ☐ No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	Reporting for the Federal Funding Accountability and Transparency Act of 2006.
17.2	Who is responsible for assuring the other agency properly uses the data?	Wendall Oaks, Director – USDA – NRCS – ITC wendall.oaks@ftc.usda.gov (970) 295-5479
18	Is the data transmitted to another agency or an independent site?	☒ Yes ☐ No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	
19	Is the system operated in more than one site?	☐ Yes ☒ No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	N/A

2.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	Programmers to provide Tier 3 support, although they have no programmatic access in production environment. PSO, System and Database Administrators at web farm. Neither users nor programmers have access to direct database in production.
21	How will user access to the data be determined?	Role-based Access Control granted to NRCS State Coordinators through NRCS State Conservationists via eAuthentication and ZRoles.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	☐ Yes ☒ No
22	How will user access to the data be restricted?	Role-based Access Control through web-based user interface.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	☒ Yes Users must be on the USDA network backbone, using a CCE computer, with valid eAuthentication and ZRoles credentials. ☐ No

No.	Question	Response
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	☒ Yes ☐ No

2.6 Customer Protection

No.	Question	Response
24	Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)?	Wendall Oaks, Director – USDA – NRCS – ITC wendall.oaks@ftc.usda.gov (970) 295-5479
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	If incident response assistance is needed for customers or employees, partners, volunteers, and contractors contact the USDA CIRT or NRCS Security Response Team via the following numbers: • USDA CIRT Hotline for Lost or Stolen Equipment: 888-926-2373 • USDA CIRT Hotline for reporting Personal Identifiable Incidents (PII): 877-744-2968 (PII-2YOU) • NRCS/CD: (703) 200-3008 or e-mail address NRCS.Security@usda.gov Additionally, each state has an Information Systems Security Point of Contact (ISSPOC) and a State Administrative Officer (SAO) that can be contacted at their Center or State Office. Furthermore, NRCS leverages incident response assistance from the USDA Cyber Security. The USDA Cyber Security provides an incident response support resource that offers advice and assistance to users of the information system for the handling and reporting of security incidents. The support resource is an integral part of the organization's incident response capability.
26	A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?	☒ Yes – If YES, go to question 27. ☐ No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	N/A

No.	Question	Response
27	Consider the following: • Consolidation and linkage of files and systems • Derivation of data • Accelerated information processing and decision making • Use of new technologies Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?	☐ Yes ☒ No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	**N/A**
28	How will the system and its use ensure equitable treatment of customers?	ProTracts/FundManager accepts applications from all citizens. All applications then undergo a NRCS ranking system to select candidates for contracts.
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	☐ Yes ☒ No – If NO, go to question 30
29.1	Explain	**N/A**

3 System of Record

No.	Question	Response
30	Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?	☒ Yes ☐ No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	Participant name, Tax ID (SSN, EIN), SCIMS ID, Contract number.
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov.)	CPD
30.3	If the system is being modified, will the SOR require amendment or revision?	☐ Yes ☒ No

4 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	☐ Yes ☒ No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	**N/A**

5 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes.

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE FOR CYBER SECURITY.

Privacy Impact Assessment Authorization

Memorandum

I have carefully assessed the Privacy Impact Assessment for the

_____

(System Name)

This document has been completed in accordance with the requirements of the E-Government Act of 2002.

We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

_____   _____

System Manager/Owner   Date
OR Project Representative
OR Program/Office Head.

_____   _____

Agency's Chief FOIA officer   Date
OR Senior Official for Privacy
OR Designated privacy person

_____   _____

Agency OCIO   Date